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UNIT

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAMZI SULIMAN, and
JEFFREY NOWAK,

Defendants.

Defendants.

Case Nos. 2:13-cr-132-LDG-VCF;
2:11-mj-162-LRL
2:11-mj-164-LRL
2:11-mj-165-LRL

MAMENDED MOTION TO
UNSEAL SEARCH WARRANTS

The United States, by and through its undersigned counsel, hereby moves the Court to unseal Case Numbers 2:11-mj-162-LRL, 2:11-mj-163-LRL, 2:11-mj-164-LRL, and 2:11-mj-165-LRL, so that the United States may produce the search warrants and supporting affidavits in this case.

The search warrants and affidavits in these matters were sealed in 2011 at the request of the United States in order to protect an ongoing investigation. The warrants authorized searches of the defendants' businesses, Case Nos. 2:11-mj-162-LRL, 2:11-mj-163-LRL, and 2:11-mj-164-LRL, and defendant Nowak's home, Case No. 2:11-mj-165-LRL, for evidence of alleged violations of tax law. The defendants have since been indicted on charges of tax evasion and conspiracy in *United States v. Suliman et al.*, 2:13-cr-132-LDG-VCF. The United States intends to use evidence it recovered during the search warrant during its case in chief against the defendants.

The reason for sealing the search warrants and affidavits no longer exists. Further, 1 the United States has a duty to produce these materials in this case. For these reasons, the United 2 States asks the Court to unseal the following matters so that the United States may produce the 3 search warrants and supporting affidavits: Case Nos. 2:11-mj-162-LRL, 2:11-mj-163-LRL, 2:11-4 mj-164-LRL, and 2:11-mj-165-LRL. 5 Dated: May 22, 2013. 6 Respectfully submitted, 7 DANIEL G. BOGDEN 8 United States Attorney 9 /s/ Kathryn C. Newman 10 KATHRYN C. NEWMAN Assistant United States Attorney 11 12 13 <del>[PROPOSED]</del> ORDER 14 IT IS HEREBY ORDERED that the following matters are unsealed: Case Nos. 15 2:11-mj-162-LRL, 2:11-mj-163-LRL, 2:11-mj-164-LRL, and 2:11-mj-165-LRL. 16 17 18 UNITED STATES MAGISTRATE JUDGE 19 20 21 22 23 24 25 26